

## Compliance Rules for AMAG Suppliers

valid for all AMAG companies

Revision: 02; Last modified 18/06/2018

### Procurement Policy – Our Principles

As a premium supplier of recycled foundry aluminium alloys and rolled products, AMAG Austria Metall AG (AMAG) and all of its subsidiaries (AMAG Group) are aware of their special responsibility towards their employees and business partners. Our ethical, social and ecological principles are also manifest in the AMAG Code of Conduct.

AMAG is a member of the Aluminium Stewardship Initiative (ASI) and has committed itself to support responsible production and procurement as well as the stewardship of aluminium.

We uphold the principle of Adding Value Through Appreciation and encourage its implementation throughout our supply chain. We expect all our business partners to assist us meet these responsibilities and to actively support and respect our values and principles in their own business practices.

#### 1. Integrity and Management

AMAG regards integrity and reliability in the business relations with all stakeholders as an essential precondition for conducting business in a sustainable way.

##### Our central principles and requirements with respect to integrity and management are:

- To support an open, fair and competitive business environment.
- To comply with all pertinent, applicable laws and regulations.
- All business and financial information concerning AMAG and its trading partners are confidential and must not be disclosed to third parties.
- Conflicts of interest must not interfere with our regular business processes.
- There is zero tolerance for corruption. This includes the payment of bribes, the acceptance or granting of other benefits in the context of bribery, acceptance of gifts or other undue benefits, illegal price-fixing agreements etc.
- When providing services to AMAG, the applicable anti-money laundering regulation, anti-corruption law and economic sanctions imposed by the EU, the UN or the USA must be observed.

#### 2. Occupational Safety and Human Rights

AMAG has a policy of non-discriminatory respect for the dignity of every human being, as anchored in the Universal Declaration of Human Rights and in the key treaties of the International Labour Organization.

AMAG has also implemented a management system for occupational health and safety (OHSAS 18001).

##### Our central principles and requirements with respect to occupational safety and human rights are:

- To ensure all workplaces comply with the occupational health and safety requirements.
- To treat employees fairly in terms of reasonable working hours, regular vacations and a remuneration that reflects their performance.
- To treat employees in accordance with the principle of equal opportunities without discrimination of race, skin colour, gender, religion, membership in a group, origin or another personal attribute.
- To ensure that the applicable standards of the International Labour Organization are observed and, in particular, the commitment not to engage in child labour, forced labour or bonded labour.
- Employees have the right to establish or join an independent employee representation organization authorized to handle collective bargaining with respect to work conditions.
- There will be no direct or indirect financing or other kind of support for non-governmental armed groups. If applicable, respect and safeguard of the rights and interests of local communities is ensured.

### **3. Environmental Protection and Energy Efficiency**

AMAG strives to treat the environment with the care it deserves and follows the legal regulations applicable to our operations. The environmental and energy management system (ISO 14001 and ISO 50001) implemented by AMAG emphasizes the significance of environmental protection and energy efficiency for AMAG.

#### **Our central principles and requirements with respect to environmental protection and energy efficiency are:**

- The disposal of refuse and wastewater, as well as the emission of air pollutants, is conducted in a controlled manner and in compliance with the statutory and internal requirements.
- The production and supply chain processes are designed environmentally friendly, energy efficient and resource efficient.
- The risk of polluting the environment by substance discharges and leaks is prevented or reduced in all production and ancillary processes.
- Our suppliers support us in promoting, developing and propagating environmentally-friendly technologies.

#### **Compliance**

These Compliance Rules apply for all suppliers and service providers that are in a contractual relationship with AMAG. They postulate fundamental principles that AMAG considers authoritative for its suppliers. AMAG expects active support from its suppliers in upholding the principles stated above, and to integrate them into their own business practices. They are expected to take suitable measures aimed at ensuring that these principles are communicated to all employees and suppliers and actively implemented by them. AMAG will monitor the conduct and performance in this respect to ensure the Compliance Rules are observed throughout the supply chain.

Employees, suppliers and other external stakeholders are requested to promptly and accurately communicate any failure to comply with these Compliance Rules or other internal or statutory guidelines, regulations and requirements to AMAG.

#### **Violations of these Compliance Rules may be reported to the AMAG Compliance Line. Confidentiality is guaranteed:**

- E-mail: [ethics@amag.at](mailto:ethics@amag.at)
- Phone: +43 7722 801 2227

If a case of non-compliance becomes known, AMAG and its suppliers will take prompt action to rectify this area of non-compliance.

If an agreement cannot be reached, or if a solution cannot be found, AMAG is entitled to terminate the business relationship and cancel contractual agreements as a last resort.